

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	421914
<015>	Study Area Name	MARK TWAIN RURAL TEL
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	Denise Dames
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6604235211 ext.34
<039>	Contact Email Address: Email of the person identified in data line <030>	controller@marktwain.coop
	Form Type	54.313 and 54.422

**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<110>	Has your company received its ETC certification from the FCC?	(yes / no ) <input type="radio"/> <input checked="" type="radio"/>
	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<111>	year plan" filed with the FCC?	(yes / no ) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

421914mo112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Yes

**(200) Service Outage Reporting (Voice)**  
**Data Collection Form**

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<210> For the prior calendar year, were there any reportable voice service outages? No

[illegible]

**(300) Unfulfilled Service Request  
Data Collection Form**

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&lt;300&gt; Unfulfilled service request (voice)

0

&lt;310&gt; Detail on attempts (voice)

Name of Attached Document

&lt;320&gt; Unfulfilled service request (broadband)

0

&lt;330&gt; Detail on attempts (broadband)

Name of Attached Document

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<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

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<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
421914M0510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	

<b>(600) Functionality in Emergency Situations</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	controller@marktwain.coop
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	421914MO610.pdf

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<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	16.0

[illegible]



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-- See attached worksheet --

**(800) Operating Companies  
Data Collection Form**

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<039>	Contact Email Address - Email Address of person identified in data line <030>	controller@marktwain.coop
<810>	Reporting Carrier	Mark Twain Rural Telephone Company
<811>	Holding Company	Mark Twain Rural Telephone Company
<812>	Operating Company	Mark Twain Rural Telephone Company

[illegible]

**(900) Tribal Lands Reporting  
Data Collection Form**FCC Form 481  
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&lt;900&gt; Does the filing entity offer tribal land services? (Y/N) No

&lt;910&gt; Tribal Land(s) on which ETC Serves

&lt;920&gt; Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

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<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 421914MO1010.pdf

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Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 421914MO1030.pdf

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Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

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&lt;1100&gt; Certify whether terrestrial backhaul options exist (Y/N)

Yes

&lt;1130&gt; Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline**  
**Data Collection Form**

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<1210> Terms & Conditions of Voice Telephony Lifeline Plans

421914MO1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |        |   |                                     |
|--------|---|-------------------------------------|
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> | Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> | Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

**(2000) Price Cap Carrier Additional Documentation**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

July 2013

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Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support
- <2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support
- <2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 1 or Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing  
Required Information

Name of Attached Document Listing  
Required Information

**(2000) Price Cap Carrier Additional Documentation (Continued)****Data Collection Form***Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

&lt;2016&gt; Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

&lt;2017A&gt; Connect America Fund Phase II recipient?

&lt;2017B&gt; Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing  
Required Information

cap carrier used for capital expenditures in 2015.

&lt;2018&gt; Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing  
Required Information

&lt;2019&gt; Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

&lt;2020&gt; Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

&lt;2021&gt; Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

&lt;2026&gt; Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

&lt;2027&gt; Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)



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Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}	Yes - Attach Certification	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	421914mo3010b.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input checked="" type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input checked="" type="checkbox"/>
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	421914mo3026.pdf

**(3005) Rate Of Return Carrier Additional Documentation (Continued)**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

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**Financial Data Summary**

(3027) Revenue

4419285

(3028) Operating Expenses

4233343

(3029) Net Income

164381

(3030) Telephone Plant In Service(TPIS)

35722364

(3031) Total Assets

20723412

(3032) Total Debt

415737

(3033) Total Equity

20307675

(3034) Dividends

1000

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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

**4001.** Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

**4003a.** RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information

**Certification - Reporting Carrier  
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**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: MARK TWAIN RURAL TEL	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/29/2016
Printed name of Authorized Officer: Jim Lyon	
Title or position of Authorized Officer: Executive V.P. & General Manager	
Telephone number of Authorized Officer: 6604235211 ext.	
Study Area Code of Reporting Carrier: 421914	Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier  
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**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

<b>(700) Price Offerings including Voice Rate Data</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	421914
<015>	Study Area Name	MARK TWAIN RURAL TEL
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Denise Dames
<035>	Contact Telephone Number - Number of person identified in data line <030>	6604235211 ext.34
<039>	Contact Email Address - Email Address of person identified in data line <030>	controller@marktwain.coop

<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	16.0

<703>

[illegible]

<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	421914
<015>	Study Area Name	MARK TWAIN RURAL TEL
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Denise Dames
<035>	Contact Telephone Number - Number of person identified in data line <030>	6604235211 ext.34
<039>	Contact Email Address - Email Address of person identified in data line <030>	controller@marktwain.coop

[illegible]



<b>(800) Operating Companies</b>	FCC Form 481
<b>Data Collection Form</b>	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	421914
<015>	Study Area Name	MARK TWAIN RURAL TEL
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Denise Dames
<035>	Contact Telephone Number - Number of person identified in data line <030>	6604235211 ext.34
<039>	Contact Email Address - Email Address of person identified in data line <030>	controller@marktwain.coop
<810>	Reporting Carrier	Mark Twain Rural Telephone Company
<811>	Holding Company	Mark Twain Rural Telephone Company
<812>	Operating Company	Mark Twain Rural Telephone Company

[illegible]

# Mark Twain Rural Telephone Cooperative

2016

## PROGRESS REPORT ON QUALITY IMPROVEMENT PLAN

### PREAMBLE

This document is an integral part of the Company's 2016 Annual Report, as attached to Form 481. It is in compliance with §54.313(a)(1) adopted in the FCC's USF/ICC Transformation Order (11-161) and incorporates all further clarifications identified in subsequent Reconsideration Orders, as applicable, that were in effect at the time the Annual Report was due by Rule to the requisite regulatory authorities.

Mark Twain Rural Telephone Cooperative advises that the environment in which the Company operates is dynamic, not static. As a result, certain network targets identified in its initial 5 Year Network Improvement Plan filed in 2014, may be modified in response to regulatory decisions that have been subsequently adopted, and as their implication upon the Company's financial viability in providing the required services and service level quality became known, such as the uncertainty of legacy rate-of-return support and model-based support.

Modifications to the network plan may also have been taken due to changes in market conditions, technology vendor support, weather or other emergency related contingencies.

Targets not met or changed since the initial 5 Year Plan filing are identified and reasons provided for those changes

### UNIVERSAL SERVICE SUPPORT RECEIVED IN 2015

Per the Universal Service Administrative Company (USAC), as available for the period up to this filing, Mark Twain received a total of \$1,281,141 in USF support funds. The breakdown of the funding to the point of filing is:

\$361,029	High Cost Loop Support
\$428,508	Connect American Fund-Intercarrier Compensation Support
\$491,604	Interstate Common Line Support

Universal Service Support funds are used to: 1) maintain, upgrade, and improve the Company's network and, 2) cover operating expenses and debt commitments as necessary to permit it to offer a high level of service for both voice and broadband within the authorized serving area.

USF support will continue to be included in the Company's current revenue accounts and forward-looking projections. Revenues, in the aggregate, are used for both capital expenditures as well as to cover operating expenses and fixed costs incurred to obtain capital from lenders. The Company does not segregate USF separately for purposes of capital and operating expenditures; USF is expended in the same proportion as all other revenue sources

The proportionate share of USF expenditures in 2015 for CAPEX is \$25,779 (2%); for OPEX \$1,255,362 (98%).

## **Mark Twain Rural Telephone Cooperative**

In the accompanying 2015 project detail, expenditures for network improvements sometimes involve service quality, coverage and capacity as an integrated improvement project and are not mutually exclusive from one another. In terms of cost, projects involving multiple qualifiers are of equal dollar equivalence. Where a project involves a single qualifier, it is so noted.

### **PROGRESS REPORT**

#### **2015**

Mark Twain completed its Battery and Power Replacement projects in all exchanges in 2015 for a total cost of \$178,872. The prior estimated cost was \$50,000, but additional power issues required an additional \$104,985 to be allocated in 2015. Due to a change in the Company's plan to upgrade its transport network, funds originally estimated for a DLC, fiber and OSP for ring and Broadband Loop Carrier have been reevaluated for future deployment. The transport upgrade will be funded over the next few years. The Company also invested \$756,783 in repair and maintenance of its existing plant. Mark Twain completed these network improvements in 2015 for a total cost of \$935,655 to improve service quality, coverage and capacity for its voice and broadband network. Detailed information of the projects, including a breakdown of costs between voice and broadband, population impacted and estimated completion dates is provided in the attached spreadsheet.

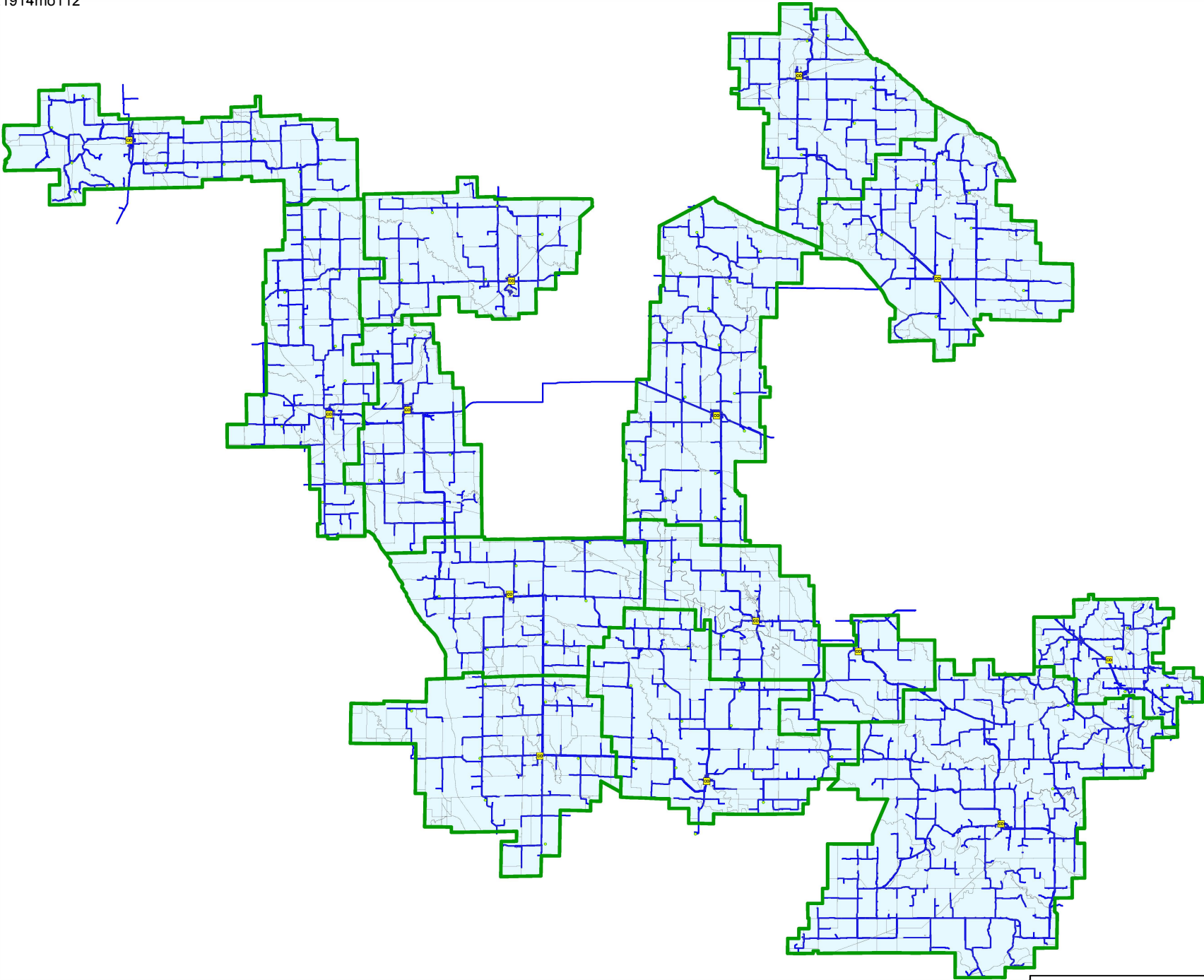
Mark Twain Rural Telephone Cooperative  
**NETWORK IMPROVEMENT PROJECTS-PROGRESS REPORT**  
 AS OF 2016 ANNUAL REPORT SUBMISSION - JULY 1, 2016

Confidential - Not for Public Inspection

WIRE CENTER NAME	DESCRIPTION of IMPROVEMENT	PURPOSE	COST ESTIMATE	ACTUAL COST	REGULATED % ALLOCATION	AMOUNT IN USF SUPPORT AREA	% VOICE	ALLOCATED VOICE	% BROADBAND	ALLOCATED BROADBAND	AREA IMPACTED	POPULATION IMPACTED	TARGET COMPLETE DATE	ACTUAL COMPLETE DATE	NOTES
Hurdland, Baring, Leonard PROJECT 15-1	Battery and Power Replacement. Hurdland 2006, Baring 2001, Leonard 2001	General	\$50,000	\$28,000	100%	\$28,000	50%	\$14,000	50%	\$14,000	193	1,165	Q2 2015	Q2 2015	
Leonard PROJECT 15-2	Fiber and OSP for ring and BLC Voided because of Transport Upgrade	service quality, coverage & capacity	\$113,500		100%	\$0	50%	\$0	50%	\$0	80	334	Q4 2015		1
Wyaconda PROJECT 15-3	Fiber and OSP for ring and BLC Voided because of Transport Upgrade	service quality, coverage & capacity	\$146,000		100%	\$0	50%	\$0	50%	\$0	61	487	Q4 2015		1
11 Exchanges PROJECT 15-4 (UPGRADED CAPACITY)	Replace MD Sonet Terminals with new IP capable gear Upgraded to 3 ring 10G Transport capable of supporting future BLC electronics and GPON	service quality & capacity	\$200,000		100%	\$0	50%	\$0	50%	\$0	815	6,328	Q4 2015		3
Leonard, Wyaconda, Newark Project 15-5	Replace current DLC with Broadband Loop Carrier and replace legacy remote with broadband remote Voided because of Transport Upgrade	service quality, coverage & capacity	\$354,500		100%	\$0	50%	\$0	50%	\$0	223	1,179	Q4 2015		1
All Exchanges Project 15-6	Replace service vehicles as they are due	General	\$115,000	\$ 55,000	100%	\$ 55,000	50%	\$27,500	50%	\$27,500	All	All	Q4 2015	Q4 2015	2
Project 15-6A(ADDED)	Added CO Surge Protection in all CO's			\$ 41,350		\$ 41,350	50%	\$20,675	50%	\$20,675	All	All		Q4 2015	2
Project 15-6B(ADDED)	Replace batteries in 30 cabinet sites			\$ 30,634		\$ 30,634	50%	\$15,317	50%	\$15,317	All	360		Q4 2015	2
Project 15-6C(ADDED)	Added Power Invertor in Hurdland CO for AC devices			\$ 23,888		\$ 23,888	50%	\$11,944	50%	\$11,944	All	All		Q4 2015	2
	TOTAL CAPEX		\$979,000	\$178,872		\$178,872		\$89,436		\$89,436					
Repairs and Maintenance Expenses - All exchanges			\$1,100,000	\$756,783	100%	\$756,783	50%	\$378,392	50%	\$378,392				Q4 2015	4
	TOTALS, including Repairs and Maintenance		\$2,079,000	\$935,655		\$935,655		\$467,828		\$467,828					

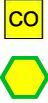
## Notes

- 1 Transport upgrade change makes project unnecessary
- 2 Trasnport upgrade to be completed in 2016
- 3 Projects added in 2015
- 4 Repair & Maintenance expense requirements lower than estimated



EXISTING NETWORK  
EXCHANGE BOUNDARY  
CENSUS BLOCKS  
GREATER THAN 4MB  
BROADBAND CAPABILITY

CO LOCATION  
REMOTE  
LOCATION



MARK TWAIN RURAL TELEPHONE COMPANY  
HURDLAND, MO

ALL EXCHANGES  
FCC 481 2015 PROGRESS REPORT MAP

SCALE: NOT TO SCALE | DATE: 06-2015

## **Service Quality Standards & Consumer Protection Rules Compliance:**

### **Consumer Protection**

#### Voice and Broadband

Mark Twain Rural Telephone Company complies with the requirements of 47CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag Rules to prevent identity threat. A manual for each of those programs is in place and is part of the employees' handbook. Employee training is conducted annually and new hires are instructed on the programs as required by their job functions.

### **Service Quality Standards**

#### Voice

Mark Twain Rural Telephone Company complies with the consumer protections, quality of service standard, service objective level, customer inquiry and customer dispute provisions of the state of Missouri. Mark Twain Rural Telephone Company is committed to providing the highest quality service to its customers.

#### Broadband

Mark Twain Rural Telephone Company complies with the service standards as established by state regulatory commission. Mark Twain Rural Telephone Company follows the service standards noted in NECA Tariff #5 and is committed to provide the highest quality service to its broadband customers.

## **Mark Twain Rural Telephone Company Ability to Function in Emergency Situations**

Mark Twain Rural Telephone Company ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)<sup>1</sup> and the Missouri Code of State Regulations. The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery reserve that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites and has a maintenance program in place.

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

## **Mark Twain Rural Telephone Company Voice Services Rate Comparability**

As published annually by the Wireline Competition Bureau, as required in 47 C.F.R. 54.313(a)(10), our pricing on fixed voice services is no more than two standard deviations above the applicable national average urban rate for voice service. The national average is \$21.22, and two standard deviations would be \$47.48. Our fixed voice service rate is \$16.00.



## **Mark Twain Rural Telephone Company Broadband Services Rate Comparability**

Mark Twain Rural Telephone Company Broadband Services Pricing meets the FCC's broadband public interest obligations because it is no more than the applicable benchmark for broadband services announced by the Bureau on April 16, 2015 (DA15-470).

In furtherance with its broadband public interest obligation pursuant to 54.308(a), Mark Twain Rural Telephone Company offers broadband service, upon reasonable request, at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications and usage capacity that is reasonably comparable to comparable offerings in urban areas, at rates that are reasonably comparable to rates for comparable offerings in urban areas.

If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 6 Mbps downstream/1 Mbps upstream is reasonable, Mark Twain Rural Telephone Company offers broadband service at actual speeds of at least 6 Mbps downstream/1 Mbps upstream at pricing that meets the bureau's broadband reasonable comparability service rates.

Currently, Mark Twain Rural Telephone Company has had no reasonable requests for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream. However, as shown by the response to Line 710 on its Form 481 filing, Mark Twain offers broadband service of 6 Mbps downstream/1 Mbps upstream with no usage allowances below the benchmark rate.

# Affordable Phone Service

as low as



**\$8.75/month\***

\*This monthly rate does not include applicable local, 911, state and federal taxes.

The Missouri Universal Service Fund is a state program which is divided into two sections— Lifeline and Disabled. Lifeline customers receive both state and federal funds. Disabled customers received only state support. The discount varies between \$6.50 and \$15.75 depending on your method of qualification.

If you or a dependent residing in your household are receiving benefits from one or more of the programs listed below, please contact Mark Twain Rural Telephone Company at 660-423-5211 for more information. The office hours are 8:00 a.m. to 4:45 p.m., Monday thru Friday.

## **LIFELINE PROGRAM**

- MO HealthNet (f/k/a Medicaid)
- Supplemental Nutrition Assistance (Food Stamps)
- Supplemental Security Income (SSI)
- Low-Income Home Energy Assistance Program (LIHEAP)
- Federal Public Housing Assistance (Section 8)
- National School Free Lunch Program
- Temporary Assistance for Needy Families (TANF)
- 135% of the Federal Poverty Level

## **DISABLED PROGRAM**

- Veteran Administration Disability Benefits
- State Blind Pension
- State Aid to Blind Persons
- State Supplemental Disability Assistance
- Federal Social Security Disability
- Federal Supplemental Security Income

# Mark Twain Rural Telephone Company

## Missouri Application for the Lifeline or Disabled Programs

Consumers meeting certain eligibility criteria are able to receive monthly discounts for voice telephony service through the Lifeline program or the Disabled program. Lifeline service offers a monthly discount up to \$15.75. The Disabled program offers a \$6.50 monthly discount. To apply complete this form and submit **proof of eligibility** if “Proof Required” box is checked.

☐ Initial Application  
☐ Proof Required

**OR**

☐ Annual Re-certification  
☐ Proof Required      ☐ No Proof Required

Eligibility Criteria	
Lifeline Program	Disabled Program
<p>___ MO HealthNet (f/k/a Medicaid)</p> <p>___ Supplemental Nutrition Assistance (Food Stamps)</p> <p>___ Supplemental Security Income</p> <p>___ Low-Income Home Energy Assistance (LIHEAP)</p> <p>___ Federal Public Housing Assistance (Section 8)</p> <p>___ National School Free Lunch Program</p> <p>___ Temporary Assistance for Needy Families (TANF)</p> <p>___ 135% of the Federal Poverty Level  <i>(See next page for income threshold requirements)</i></p>	<p>___ Veteran Administration Disability Benefits</p> <p>___ State Blind Pension</p> <p>___ State Aid to Blind Persons</p> <p>___ State Supplemental Disability Assistance</p> <p>___ Federal Social Security Disability</p>

<b>Account Owner Name:</b>				Home Phone Number:	
Email Address:			Daytime or Can Be Reached Phone Number:		
Last 4 Digits of SSN: <small>(If account owner is program beneficiary)</small>	Date of Birth: <small>(If account owner is program beneficiary)</small>	DCN:* <small>(*This number only applies if participating in MO HealthNet, Food Stamps, LIHEAP, and TANF)</small> <small>(If account owner is program beneficiary)</small>			
Home Address:	Street	Apt.	City	State	Zip Code
Is your home address temporary? <input type="checkbox"/> YES <input type="checkbox"/> NO <small>(If “yes” then must verify address every 90 days.)</small>					
Billing Address: <small>(If different from above)</small>	Street	Apt.	City	State	Zip Code

<b>Program beneficiary name (if different than account owner):</b>		
DCN* (If applicable): <small>(*This number is assigned to program participants of MO HealthNet, Food Stamps, LIHEAP, and TANF)</small>		
Relationship to account owner:	Last 4 Digits of SSN:	Date of Birth:

**I understand the following obligations and provisions about the Lifeline and Disabled programs:**

- The Lifeline and Disabled programs are government benefit programs and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Only one Lifeline or Disabled service is available per household.
- A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.
- A household is not permitted to receive Lifeline or Disabled benefits from multiple providers or combine Lifeline and Disabled program benefits. Your household may receive Lifeline or Disabled benefits on one wireless **OR** one home (wireline) telephone. Your household may not receive the Lifeline or Disabled benefit from more than one Telephone company.
- Violation of the one-per-household limitation constitutes a violation of rules and will result in the subscriber’s de-enrollment from the program.
- Lifeline and the Disabled program are non-transferable benefits and the subscriber may not transfer his or her benefit to any other person, even if he or she is eligible.

**I CERTIFY UNDER PENALTY OF PERJURY EACH OF THE FOLLOWING:**

- My household meets the eligibility criteria for the Lifeline program or the Disabled program.
- I will provide notification to my voice service provider within 30 days if for any reasons my household no longer satisfies the criteria for receiving Lifeline or Disabled benefits including, as relevant, if my household no longer meet the income-based or program-based criteria for receiving Lifeline or Disabled support, I receive more than one Lifeline or Disabled benefit, or another member of my household is receiving a Lifeline or Disabled benefit.
- If I move to a new address I will provide that new address to my voice service provider within 30 days.
- If I have a temporary residential address then I will be required to verify my address with my voice service provider every 90 days.
- My household will receive only one Lifeline or Disabled service and, to the best of my knowledge, my household is not already receiving a Lifeline or Disabled service from any company.
- I acknowledge the obligation to re-certify my continued eligibility for Lifeline or Disabled benefits at any time and failure to re-certify my continued eligibility will result in de-enrollment and the termination of Lifeline or Disabled benefits.
- I give permission to release to the Universal Service Administrative Company (USAC) or its agent any records required to confirm that my household only receives one Lifeline benefit. If USAC finds that my household receives more than one Lifeline benefit, USAC will notify the telephone companies, and I will have to select one service and I will be de-enrolled from the other. I also consent to sharing my account information with the Federal Communications Commission and Missouri Public Service Commission who oversee and administer the Lifeline or Disabled programs.

\_\_\_\_\_ I certify I have \_\_\_\_\_ individuals in my household.  
*(Initial and complete only if qualifying under income threshold which appears in the pink box below.)*

**The information supplied on this form is true and correct.**

**I acknowledge providing false or fraudulent information to receive Lifeline or Disabled benefits is punishable by law.**

\_\_\_\_\_  
**Signature of Account Owner**

\_\_\_\_\_  
**Date**

**Submit a completed signed form and proof of eligibility if applicable.**

Annual Income Thresholds for Meeting 135% of Federal Poverty Level (Based on Household Size)								
1	2	3	4	5	6	7	8	Each add'l person
\$16,038	\$21,627	\$27,216	\$32,805	\$38,394	\$43,983	\$49,586	\$55,202	+ \$5,616/person

*Acceptable documentation for meeting the criteria of 135% of the federal poverty level includes: a copy of prior year's state or federal tax return; paycheck stub (three consecutive months); a statement of benefits for Social Security, Veterans Administration, retirement/pension or Unemployment/Workmen's Compensation; or other legal documents showing current income (e.g. divorce decree, child support award). Any documentation must cover a full year or three consecutive months within the previous twelve months.*

**Company Use Only:**

**I have reviewed the form to be complete and hereby attest the applicant presented acceptable proof of eligibility for the \_\_\_\_\_ program (if applicable).**

\_\_\_\_\_  
**Print Name of company official**

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

**NLAD database queried? Yes or No**

**Lifeline Household Worksheet? Yes or No**

**De-enroll Date: \_\_\_\_\_**

**Mail application and proof of eligibility (if applicable) to:  
 MARK TWAIN RURAL TELEPHONE COMPANY  
 48054 State Hwy 6, P.O. Box 68, Hurdland, MO 63547**

421914mo1210

All of our Lifeline customers receive unlimited local minutes and they have an equal access choice of long distance carriers for toll plans and the long distance carriers determine the rates, terms and conditions of each plan, not Mark Twain Rural Telephone Company.



June 29, 2016

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

Re: WC Docket No. 14-58, 2016 Annual Report, Form 481 for High-Cost Recipient  
54.313(f)(1) "Milestone Certification"

Dear Ms. Dortch:

In compliance with the filing requirements associated with, and attached to Form 481, we wish to advise the Commission that The Mark Twain Rural Telephone Company provides High Speed Internet service to its customers and:

- Has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of 10 Mbps downstream / 1 Mbps upstream;
- Provides latency suitable for real-time applications and usage capacity which is reasonably comparable to those in urban areas and;
- That reasonable requests for service are met within a reasonable timeframe.

If a request for broadband service at actual speeds of at least 10 Mbps downstream / 1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 6 Mbps downstream / 1 Mbps upstream is reasonable, our company offers broadband service at actual speeds of at least 6 Mbps downstream / 1 Mbps upstream at pricing that meets the Wireline Competition Bureau's broadband reasonable comparability service rates benchmark.

If there are questions, I may be contacted at 660-423-5211

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jim Lyon'.

Jim Lyon  
Executive V.P. & General Manager

**MARK TWAIN RURAL TELEPHONE COMPANY  
HURDLAND, MISSOURI**

**BALANCE SHEETS  
December 31, 2015 and 2014**

	<u>2015</u>	<u>2014</u>
<u>ASSETS</u>		
<b>CURRENT ASSETS</b>		
Cash and cash equivalents	\$ 986,138	\$ 198,247
Temporary investments	4,502,254	5,287,652
Accounts receivable:		
Due from customers	9,695	8,763
Interexchange carriers		
Less allowance of \$4,960	167,956	207,894
Affiliates	323,135	255,966
Other	66,928	52,490
Prepaid income taxes	38,078	-
Materials and supplies at average cost	206,186	141,273
Prepayments	52,845	72,596
Deferred income taxes	25,354	20,554
	<u>6,378,569</u>	<u>6,245,435</u>
<b>OTHER NONCURRENT ASSETS</b>		
Investment in affiliates	7,149,175	6,543,291
Other investments	233,047	221,284
Long-term prepayments	9,252	23,102
Deferred income taxes	219,387	230,408
	<u>7,610,861</u>	<u>7,018,085</u>
<b>PROPERTY, PLANT AND EQUIPMENT</b>		
Telephone plant in service	35,722,364	35,490,569
Less accumulated depreciation	<u>29,257,847</u>	<u>28,583,862</u>
	6,464,517	6,906,707
Plant under construction	269,465	79,803
	<u>6,733,982</u>	<u>6,986,510</u>
<b>TOTAL ASSETS</b>	<u>\$ 20,723,412</u>	<u>\$ 20,250,030</u>

The accompanying notes are an integral part of these financial statements.

**MARK TWAIN RURAL TELEPHONE COMPANY  
HURDLAND, MISSOURI**

**BALANCE SHEETS  
December 31, 2015 and 2014**

	<u>2015</u>	<u>2014</u>
<u>LIABILITIES AND MEMBERS' EQUITY</u>		
<b>CURRENT LIABILITIES</b>		
Accounts payable:		
Interexchange carriers	\$ 26,450	\$ 21,604
Affiliates	2,613	-
Other	154,259	253,672
Customer deposits	8,317	6,459
Accrued income taxes	-	56,544
Other	41,203	32,616
	<u>232,842</u>	<u>370,895</u>
<b>OTHER NONCURRENT LIABILITIES</b>		
Post-retirement benefit obligation	<u>182,895</u>	<u>182,785</u>
<b>MEMBERS' EQUITY</b>		
Memberships - \$10 par value, 4,523 and 4,571 shares issued and outstanding, respectively	45,230	45,710
Patronage capital assigned	11,120,754	10,796,164
Discounted capital credits	46,817	35,018
Accumulated Other Comprehensive Income:		
Unrecognized post-retirement obligation	(73,822)	(71,521)
Margins unassigned	9,168,696	8,890,979
	<u>20,307,675</u>	<u>19,696,350</u>
 <b>TOTAL LIABILITIES AND MEMBERS' EQUITY</b>	 <u>\$ 20,723,412</u>	 <u>\$ 20,250,030</u>

The accompanying notes are an integral part of these financial statements.



**MARK TWAIN RURAL TELEPHONE COMPANY  
HURDLAND, MISSOURI**

**STATEMENTS OF OPERATIONS  
Years ended December 31, 2015 and 2014**

	2015	2014
OPERATING REVENUES		
Local network services	\$ 703,268	\$ 654,913
Network access services	2,591,819	3,183,439
Internet services	713,115	791,531
Miscellaneous revenue	411,083	441,310
	<u>4,419,285</u>	<u>5,071,193</u>
OPERATING EXPENSES		
Plant specific operations	1,141,406	1,278,496
Plant nonspecific operations	370,821	375,511
Cost of internet services	229,601	238,363
Depreciation	1,083,411	1,036,283
Customer operations	236,505	348,319
Corporate operations	1,076,465	1,028,417
General taxes	95,134	97,151
	<u>4,233,343</u>	<u>4,402,540</u>
OPERATING MARGINS	<u>185,942</u>	<u>668,653</u>
OTHER INCOME (EXPENSE)		
Interest and dividend income	31,943	80,194
Interest expense	-	(85,153)
Other, net	(13,739)	(42,290)
	<u>18,204</u>	<u>(47,249)</u>
MARGINS BEFORE INCOME TAXES AND EQUITY EARNINGS OF SUBSIDIARIES	204,146	621,404
INCOME TAXES	<u>39,765</u>	<u>103,909</u>
MARGINS BEFORE EQUITY EARNINGS OF SUBSIDIARIES	164,381	517,495
EQUITY EARNINGS OF SUBSIDIARIES	<u>605,884</u>	<u>474,605</u>
NET MARGINS	<u>\$ 770,265</u>	<u>\$ 992,100</u>

The accompanying notes are an integral part of these financial statements.

**MARK TWAIN RURAL TELEPHONE COMPANY  
HURDLAND, MISSOURI**

**STATEMENTS OF CASH FLOWS  
Years ended December 31, 2015 and 2014**

	<u>2015</u>	<u>2014</u>
<b>CASH FLOWS FROM OPERATING ACTIVITIES</b>		
Net margins	\$ 770,265	\$ 992,100
Adjustments to reconcile net margins to net cash provided by operating activities:		
Depreciation	1,083,411	1,036,283
Deferred income taxes	7,595	82,574
Patronage in business conducted with cooperatives	(13,187)	(6,973)
Patronage distributions received from business conducted with cooperatives	1,424	1,270
Equity income in unconsolidated affiliates	(605,884)	(474,605)
Changes in assets and liabilities:		
(Increase) Decrease in:		
Receivables	(42,601)	(107,114)
Materials and supplies	(64,913)	18,489
Deferred charges	-	31,498
Prepayments	(4,477)	432
Increase (Decrease) in:		
Accounts payable	(34,695)	21,204
Accrued taxes	(56,544)	51,270
Other	6,880	(9,056)
Net cash provided by operating activities	<u>1,047,274</u>	<u>1,637,372</u>
<b>CASH FLOWS FROM INVESTING ACTIVITIES</b>		
Capital expenditures	(909,642)	(975,810)
Purchase of investments	(1,335,927)	(1,380,251)
Proceeds from sale of investments	2,121,325	2,932,492
Salvage, net of cost of removing plant	21,500	-
Net cash provided by (used in) investing activities	<u>(102,744)</u>	<u>576,431</u>
<b>CASH FLOWS FROM FINANCING ACTIVITIES</b>		
Repayment of long-term debt	-	(2,051,556)
Patronage capital retired	(161,894)	(209,453)
Excise tax refund	1,339	-
Other, net	3,916	8,175
Net cash used in financing activities	<u>(156,639)</u>	<u>(2,252,834)</u>
Net Increase (Decrease) in Cash and Cash Equivalents	787,891	(39,031)
Cash and Cash Equivalents at Beginning of Year	<u>198,247</u>	<u>237,278</u>
Cash and Cash Equivalents at End of Year	<u>\$ 986,138</u>	<u>\$ 198,247</u>

The accompanying notes are an integral part of these financial statements.



To the Board of Directors  
Mark Twain Rural Telephone Company and Subsidiaries  
Hurdland, Missouri

We have audited the consolidated financial statements of Mark Twain Rural Telephone Company and subsidiaries, as of and for the year ended December 31, 2015, and have issued our report thereon dated March 10, 2016. Professional standards require that we provide you with information about our responsibilities under generally accepted auditing standards, as well as certain information related to the planned scope and timing of our audit. We have communicated such information to you in our engagement letter dated September 11, 2015. Professional standards also require that we communicate to you the following information related to our audit.

### **Significant Audit Findings**

#### Qualitative Aspects of Accounting Practices

Management is responsible for the selection and use of appropriate accounting policies.

The significant accounting policies of the Company are described in footnotes to the consolidated financial statements. No new accounting policies were adopted and the application of existing policies was not changed during the year ended December 31, 2015. We noted no transactions entered into by the Company during the year for which there is a lack of authoritative guidance or consensus. All significant transactions have been recognized in the consolidated financial statements in the proper period.

There were no transactions entered into by the Company during the year that were both significant and unusual, and of which, under professional standards, we are required to inform you, or transactions for which there is a lack of authoritative guidance or consensus. There are no significant transactions that have been recognized in the consolidated financial statements in a different period than when the transaction occurred.

Accounting estimates are an integral part of the consolidated financial statements prepared by management and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the consolidated financial statements and because of the possibility that future events affecting them may differ significantly from those expected.

The only sensitive accounting estimates included in the consolidated financial statements for the year ended December 31, 2015, relate to the estimates for depreciation and employee benefits. As part of our audit, we compared the Company's depreciation rates to average rates used within the telecommunications industry. We have also discussed with management the Company's long-range plant replacement plans and have determined the current depreciation rates to be consistent with those plans. We also compared the reporting of employee benefit accruals to information provided by the Company's actuary.

Qualitative Aspects of Accounting Practices (Continued)

The disclosures in the financial statements are neutral, consistent and clear.

Difficulties Encountered in Performing the Audit

We encountered no significant difficulties in dealing with management in performing and completing our audit.

Corrected and Uncorrected Misstatements

Professional standards require us to accumulate all misstatements identified during the audit, other than those that are clearly trivial, and communicate them to the appropriate level of management. Management has corrected all such misstatements. In addition, none of the misstatements detected as a result of audit procedures and corrected by management were material, either individually or in the aggregate, to the financial statements taken as a whole.

Disagreements with Management

For purposes of this letter, a disagreement with management is a financial accounting, reporting or auditing matter, whether or not resolved to our satisfaction, that could be significant to the consolidated financial statements or the auditors' report. We are pleased to report that no such disagreements arose during the course of our audit.

Management Representations

We have requested certain representations from management that are included in the management representation letter dated March 10, 2016.

Management Consultations with Other Independent Accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on certain situations. If a consultation involves application of an accounting principle to the Company's consolidated financial statements or a determination of the type of auditor's opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all the relevant facts. To our knowledge, there were no such consultations with other accountants.

Other Audit Findings or Issues

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as the Company's auditor. However, these communications occurred in the normal course of our professional relationship and to our knowledge our responses were not a condition to our retention.

To the Board of Directors  
Mark Twain Rural Telephone Company and Subsidiaries  
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This letter is intended solely for the information and use of the board of directors, management of the Company, the Federal Communications Commission (FCC), Universal Service Administrative Company (USAC), and the relevant state and local regulatory agencies and is not intended to be and should not be used by anyone other than these specified parties.

*Kiesling Associates LP*  
*by Marcy Fredericks*

West Des Moines, Iowa  
March 10, 2016